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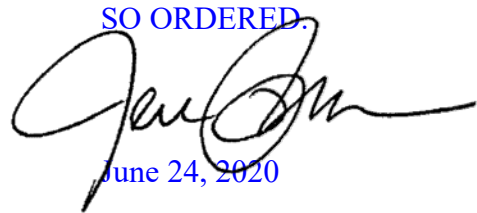
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June 24, 2020

Applications GRANTED. The Clerk of Court
is directed to terminate Doc. #108.

VIA ECF

Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

SO ORDERED.

June 24, 2020

Re: United States v. Ashu, 19 Cr. 318 (JMF)

Dear Judge Furman:

We are counsel to Defendant Cyril Ashu and write respectfully to request that the Court: (a) extend Mr. Ashu's bail for an additional period of 46 days, until Monday, August 31, 2020; and (b) modify Mr. Ashu's condition of home incarceration to home detention to permit employment approved by Pre-Trial Services. *See* Dkt. 90 (order releasing Mr. Ashu on bail). We have conferred with the Government, who consent to this extension and modification of bail terms.

Extension of Time

Since Mr. Ashu was released on April 2, 2020, he has complied with all conditions and has been supervised without incident by the Pre-Trial Services agency in the Northern District of Georgia. When the Court originally released Mr. Ashu, it directed that he would surrender in the Southern District on June 1 without further order of the Court. Mr. Ashu previously requested and was granted an extension of bail with the Government's consent. Dkt. 102. Mr. Ashu was released "in light of the dire circumstances presented by COVID-19." Dkt. 90. COVID-19 continues to threaten New York City and its immediate environs, and interstate travel remains hazardous. We respectfully submit that the "compelling reasons" for Mr. Ashu's release have not changed and – on consent of the Government, with whom we have conferred – we request that the deadline for Mr. Ashu's surrender be extended by another 46 days, to August 31, 2020.

quinn emanuel urquhart & sullivan, llp

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Modification of Terms

Since Mr. Ashu was released on April 2, 2020, he has remained in home incarceration in compliance with the Court's orders. *See* Dkt. 90. Since then, Mr. Ashu secured a conditional offer of employment. Pre-Trial Services has visited his putative employer and confirmed its existence as a *bona fide* business, as well as its offer to employ Mr. Ashu.

Mr. Ashu is eager to return to work and provide for his family. Accordingly, Mr. Ashu requests that his condition of home incarceration be modified to home detention to permit employment approved by Pre-Trial Services, with all other conditions of release, including location monitoring, remaining in place. Specifically, Mr. Ashu requests that the third condition of this Court's order approving bail (Dkt. 90) be replaced with the following two conditions:

Mr. Ashu's residence and employment will be approved in advance by Pre-Trial Services, and he must restrict his movement to his residence, his place of employment, and any necessary points in between;

Mr. Ashu must provide proof of his attendance at and earnings from his employment to Pre-Trial Services, and his failure to do so may result in notification to the Court and Mr. Ashu being restricted to his residence alone;

For the reasons stated above, we respectfully request that the Court extend Mr. Ashu's release until August 31 and modify the condition of home incarceration to home detention to permit employment as approved by the Pre-Trial Services Agency.

Respectfully,

/s/ Marc Greenwald

Marc Greenwald

cc: AUSAs Olga Zverovich and Jarrod Schaeffer (via ECF)